

HERBALIEF INTERNATIONAL OF AMERICA, INC.
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JOHN P. VENARDOS Vice President, Regulatory Affairs International Product Management

January 18, 1999

Office of Special Nutritionals (HFS-450) Center For Food Safety and Applied Nutrition FOOD & DRUG ADMINISTRATION 200 C Street, S.W.

Ref.: Cardio ToconOxTM

Washington, D.C. 20204

Dear Sir and/or Madam:

Pursuant to 21 CFR 101.93, please be advised that Herbalife International of America, Inc. has begun commercializing Cardio ToconOxTM dietary supplement in the United States.

Cardio ToconOxTM is labeled and promoted with statements provided for in section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act.

LABEL

Suggested Serving: One or more capsules daily.

Best taken in the evening after dinner.

Cardio ToconOxTM contains a potent form of Vitamin E called tocotrienols which have up to 50 times more antioxidant potential than conventional Vitamin E.

HERBALIFE FACT SHEET

DE LEGIDEO

An advanced antioxidant for good health.

FEATURES:	BENEFITS:		
Tocotrienols	A potent form of Vitamin E that can help protect the body		
	from the harmful effects of free radicals, support a healthy		
	cardiovascular system and help maintain healthy cholesterol		
Coenzyme Q10	A nutrient used in the production of energy and found in every		
	cell of your body.		
Olive Oil	Provides powerful antioxidant benefits.		
Olive Leaf Extract	A newly discovered antioxidant that can help support the heart		

and blood.

975 - 0162

LET 2918

Office of Special Nutritionals (HFS-450) Center For Food Safety and Applied Nutrition FOOD & DRUG ADMINISTRATION January 18, 1999 Page 2

PRODUCT BROCHURE INSERT

Cardio ToconOxTM

An advanced antioxidant for good health.

Herbalife has tapped into the health-enhancing benefits of Vitamin E to formulate Cardio ToconOxTM, a scientifically advanced product derived from a potent form of Vitamin E called tocotrienols. This powerhouse formula also includes the nutrient Coenzyme Q10 and a carefully balanced blend of natural botanical oils with antioxidant properties.

- Includes tocotrienols, which can help protect the body from the harmful effects of free radicals.
- Can help support a healthy cardiovascular system and help maintain healthy cholesterol.
- Contains Coenzyme Q10, a nutrient used in the production of energy and found in every cell of your body.
- Provides the antioxidant benefits of olive oil.
- Includes ofive leaf extract, a newly discovered antioxidant.

PRODUCT FLYER

Cardio ToconOx™

- Includes tocotrienols, which can help protect the body from the harmful effects of free radicals.
- Can help support a healthy cardiovascular system and help maintain healthy cholesterol.
- Contains Coenzyme Q10, a nutrient used in the production of energy and found in every cell of your body.
- Provides the antioxidant benefits of olive and rice bran oils.

Product labeling prominently bears the required boxed statement, "These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease."

Herbalife International of America, Inc. certifies that the information contained in this notice is complete and accurate, and that the Company has substantiation that the foregoing statements are truthful and not misleading.

Please do not hesitate to advise should you have any questions.

Sincerely,

File: Cardio ToconOx™ Dietary Supplement

Latin Varandos (50)

Suggested Serving. One or more capsides daily Best tables in the exensing after dinner. Cardo locanCuit combins a potent form of Vitanian E called to otherwisk which have up to 50 times more untroudent patential than conventional Vitania. E

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Herbolite products are available only through Herbolite Independent Distributors

3060-US-00-10999-HERBALIF: MT[RVAT/ONAL_INC., U.S.A.

$\textcircled{M} \textbf{HERBALIFE}_*$



Supplement Facts Serving Size: I Copsule Servings per Continues: 30			Other Ingredients: Rive bran od gelann, glycerin, lecahin, beeswax, alive od, water ond notwal Ravor
per	Anount serving	% Daily value	Cordia ToconDx" is Herbalde Mademark for the image
Vitamin E (Iran Tocomins*) 6 FU		20%	combination of Tocomes", 044 Leaf Expect and Coenzyme 010
Tocotrienols (Iroxa Tocomins*)	20 mg	- 1	30 day money back guarantee.
Dried Olive Leaf Extract	20 mg	Ť	Formulated exclusively for
Coenzyme Q10	4 mg	t	HERBALIFE INTERNATIONAL
*Percent Daily Values are based on a 2,000 calorie diet. † Daily Value not established			OF AMERICA, INC Los Angeles, (A 90080-02) U.S.A. Made in U.S.A.

HERBALIFE Fact Sheet

PRODUCT NAME:

Cardio ToconOx™

SKU#:

3060 (case of 6) 0241 (HAP or unit)

RETAIL PRICE:

\$22.95 (each)

VOLUME POINTS:

22.95

SIZE:

30 soft gels per bottle

PACKAGING:

6 bottles per case

DESCRIPTION:

An advanced antioxidant for good health.

FEATURES:

BENEFITS:

Tocotrienols

A potent form of Vitamin E that can help protect the body from the harmful effects of free radicals, support a healthy cardiovascular system and help maintain healthy cholesterol.

Coenzyme Q10

A nutrient used in the production of energy and found in

every cell of your body.

Olive Oil

Provides powerful antioxidant benefits.

Olive Leaf Extract

A newly discovered antioxidant that can help support the

heart and blood.

USER:

Adults

USAGE:

One tablet a day. Best taken in the evening after a meal.

CROSS-SELL:

Cardio ToconOx[™] can be used in conjunction with the Thermojetics® Weight-Management Program and Herbalife's

entire line of nutritional products.

COLLATERAL MATERIAL: Product Brochure Insert

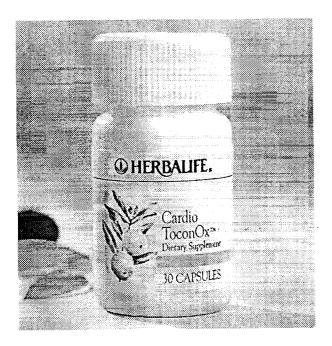


NEW PRODUC

Introducing Two New Products for Natural Health!



You're going to love Herbalife's newest natural health products. Looking for an advanced antioxidant for good health? Check out Cardio ToconOx™. Want to support your well-being? Advanced St. John's Wort with Uplifting Herbs can help enhance your mood and promote good feelings. Order today.



Cardio ToconOx_{TM}

- Includes tocotrienols, which can help protect the body from the harmful effects of free radicals.
- Can help support a healthy cardiovascular system and help maintain healthy cholesterol.
- Contains Coenzyme Q10, a nutrient used in the production of energy and found in every cell of your body.
- Provides the antioxidant benefits of olive and rice bran oils.

#3060 (case of 6) #0241 (HAP or unit) \$22.95



Advanced St. John's Wort with Uplifting Herbs

- · Formulated with high-quality St. John's Wort.
- Includes Gotu Kola, an Indian herb, that can help support the central nervous system and enhance vitality.
- Features Suma, an herb known as Brazilian
 Ginseng, used to increase energy and boost mood
 levels.
- Contains Maca, an herb known as Peruvian Ginseng, used as an energy and mental enhancer.

#3010 (case of 6) #0162 (HAP or unit) \$19.95

WHERBALIFE.

Call Today! (310) 216-7770





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